

Rebecca (Miller) Duff

Hi. Here are my thoughts on the proposed standard:

- 1) Refurbished machines must somehow be allowed into the Energy Star Program. There are several million machines in the marketplace and they are only being replaced at a rate of 250,000/300,000 per year. This means at least 10 or more years before we reach 100%. With the large machine users(Coke/Pepsi) refurbishing machines at 200,000+ per year we could cut that time almost in half. Saving all the associated greenhouse gas pollution and keeping usable units out of the land fills. If it meets the standard of new there should be no reason for denying Energy Star status.
- 2) Any energy consumption reduction solution should be automatic- not requiring any setting activity by the account or bottler. with a location settable device - there is no guarantee of the savings ever being achieved and the device will most likely create a bottler service call for resetting or reprogramming at some point in its life.
- 3) Machines refurbished to Energy Star performance must be easily/ clearly identified by the consumer to assure maximum use of/demand for - Energy Star machines.
- 4) Tracking of refurbished machines and components that can have a machine performing at Energy Star levels must be easily tracked /identified to assure easy tracking/compliance by the refurb company,
- 5) The refurbishment program should be announced as soon as possible with a later start date if necessary - Few bottlers/refurb. centers are willing to "gear up" without EPA assurance that the "rules will not change" setting the standard and program parameters now will allow start up activities- even if actual implementation date is later on.

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